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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

REGINA SANCHEZ , Individually,)	Case No. 5:15-cv-01759-FMO-JEM
And On Behalf Of All Others Similarly)	
Situated,)	JOINT STIPULATION OF
)	DISMISSAL OF ACTION WITH
Plaintiff,)	PREJUDICE AS TO THE NAMED
v.)	PLAINTIFF AND WITHOUT
)	PREJUDICE AS TO THE
RECEIVABLES PERFORMANCE)	PUTATIVE CLASS
MANAGEMENT LLC ,)	
)	
Defendant.)	
)	

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

1 The notice and approval requirements of Federal Rule of Civil Procedure
2 23(e) are inapplicable to the parties' settlement and dismissal of this putative
3 class action because this action has not been certified as a class.¹

4 The Parties agree that this Court can proceed to dismiss this Action entirely
5 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
6 Class alleged in the complaint.

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8 Respectfully submitted this 8th day of July, 2016

9 By: s/Todd M. Friedman, Esq.
10 TODD M. FRIEDMAN
11 Attorney for Plaintiffs

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13 By: s/Sean P Flynn, Esq.
14 SEAN P. FLYNN
15 Attorneys for Defendant

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¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 Filed electronically on this 8th day of July, 2016, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

4
5 Honorable Fernando M. Olguin
6 United States District Court
7 Central District of California

8 Evan M Rothman
9 Gordon and Rees LLP

10 Sean P Flynn
11 Gordon and Rees LLP

12
13 This 8th day of July, 2016

14 s/Todd M. Friedman, Esq.
15 TODD M. FRIEDMAN